

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JULIE DALESSIO, an individual,
Plaintiff,

v.

UNIVERSITY OF WASHINGTON, a
Washington Public Corporation; ELIZA
SAUNDERS, Director of the Office of
Public Records, in her personal and official
capacity; ALISON SWENSON, Compliance
Analyst, in her personal capacity; PERRY
TAPPER, Public Records Compliance
Officer, in his personal capacity; ANDREW
PALMER, Compliance Analyst, in his
personal capacity; JOHN or JANES DOES
1-12, in his or her personal capacity,
Defendants.

No. 2:17-cv-00642-MJP

DECLARATION OF DEREK C. CHEN
IN SUPPORT OF DEFENDANTS'
MOTION TO AMEND ANSWER

I, Derek C. Chen, declare as follows:

1. I am one of the attorneys representing the Defendant in this lawsuit. I make this declaration based upon my own personal knowledge, upon facts which are admissible in evidence. I am competent to testify to the matters set forth in this declaration.

2. Plaintiff notified us that he was unavailable from June 27, 2018 through July 11, 2018. On July 11, 2018, I sent him an email including the proposed stipulated agreement and draft amended Answer and asked if Plaintiff would be willing to agree to a stipulation. Plaintiff's counsel responded the next day, and counsel for the parties exchanged several emails regarding whether the parties could agree to a stipulation.

DECLARATION OF DEREK C. CHEN - 1
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KEATING, BUCKLIN & MCCORMACK, INC., P.S.

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1 Due to the deadline for amending pleadings, Defendants were required to file this
2 motion by today in order to properly note it by the deadline. I advised Plaintiff's counsel
3 that if the parties were able to come to agreement on a stipulation, Defendants would strike
4 this motion. This remains true.

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6 DATED this 12th day of July, 2018, at Seattle, Washington.

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8 /s/ Derek C. Chen

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10 Derek C. Chen, WSBA #49723
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